

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAI'I

Plaintiffs Kenneth Lake, Crystal Lake,
Harold Bean, Melinda Bean, Kyle
Pahona, Estel Pahona, Timothy
Moseley, and Ashley Moseley,

Plaintiffs,

vs.

Ohana Military Communities, LLC,
Forest City Residential Management,
Inc.; and DOE Defendants 1-10,

Defendants.

CV NO. _____

DECLARATION OF CHRISTINE A.
TERADA

DECLARATION OF CHRISTINE A. TERADA

I, Christine A. Terada, hereby declare under penalty of perjury as
follows:

1. I am an attorney with the law firm of Goodsill Anderson Quinn
& Stifel LLP, one of the attorneys representing Defendants Ohana Military
Communities, LLC and Forest City Residential Management, LLC in this matter. I
am licensed to practice law in the State of Hawai'i. I am competent to testify as to
all matters herein and make this declaration upon personal knowledge. If called as
a witness, I could and would competently testify to the truth of the matters stated
herein, except as to those matters stated to be true on information and belief.

2. Defendants were served with a copy of the Complaint and Summons on September 26, 2016. Attached hereto as Exhibit 1 is a true and correct copy of the Complaint and Summons in the above-captioned matter that was filed in the First Circuit Court for the State of Hawai‘i. No other pleadings have been filed in this action.

3. A true and correct copy of the redacted lease for Kenneth and Crystal Lake is attached to the Declaration of Paris Cousin.

4. Attached hereto as Exhibit 2 is a true and correct copy of a Preliminary Report by Fidelity National Title & Escrow of Hawaii regarding “Mololani” land at Marine Corps Base Hawai‘i.

5. Attached hereto as Exhibit 3 is a true and correct copy of a Preliminary Report by Fidelity National Title & Escrow of Hawaii regarding “Pa Honua North II” land at Marine Corps Base Hawai‘i.

6. Attached hereto as Exhibit 4 is a true and correct copy of a Preliminary Report by Fidelity National Title & Escrow of Hawaii regarding “Hawaii Loa” land at Marine Corps Base Hawai‘i.

7. Attached hereto as Exhibit 5 is a true and correct copy of a Preliminary Report by Fidelity National Title & Escrow of Hawaii regarding “Waikulu” land at Marine Corps Base Hawai‘i.

8. Attached hereto as Exhibit 6 is a true and correct copy of a

Preliminary Report by Fidelity National Title & Escrow of Hawaii regarding
“Ulupau North” land at Marine Corps Base Hawai‘i.

I swear under penalty of perjury that the foregoing is true and correct
to the best of my knowledge, information, and belief.

DATED: Honolulu, Hawai‘i, October 13, 2016

/s/ Christine A. Terada
Christine A. Terada